

# Exhibit C

**Shrestha, Roshan P.**

---

**From:** Shrestha, Roshan P.  
**Sent:** Friday, June 14, 2019 3:43 PM  
**To:** 'Frank Calvosa'  
**Cc:** 'clizza@saul.com'; 'wbaton@saul.com'; 'Sullivan, Sarah A.'; 'Moses, David L.'; 'Callo, Alexander'; 'Nick Cerrito'; 'Eric Stops'; 'Evangeline Shih'; 'Andrew Chalson'; 'Gabriel Brier'; 'Marta Godecki'; 'jpelsevier@jonesday.com'; 'cmiller@jonesday.com'; 'sjcorr@jonesday.com'; 'Pomalyst'; 'Celgene\_JD\_Lit@jonesday.com'; 'TevaPomalystKEService@kirkland.com'; 'McLennan, Mark C.'; 'Liza M. Walsh'; 'cgannon@thewalshfirm.com'; 'Eleonore Ofosu-Antwi'; 'Reichenbach, Kristen P.L.'; 'Alul, Andrew M.'; 'Murray, Brian P.'; 'Kong, T.O.'; 'Steiner, Ellie'; 'Altman, Jacqueline'; 'Hanson, Tina'; 'Siedlak, Sarah'; 'ACalmann@saiber.com'; 'JHalpern@saiber.com'; 'MHu@saiber.com'; 'Corbin, Bethany'; 'Seth, Neal'; 'wweeks@wileyrein.com'; 'csaveriano@hillwallack.com'; 'Wiley Hetero Poma'; 'Melissa Flax (MFlax@carellabyrne.com)'; Michael Cross - Carella, Byrne, Cecchi, Olstein, Brody & Agnello P.C (mcross@carellabyrne.com)  
**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Frank:

As a follow up to today's meet and confer regarding the Celgene-Synthon/Alvogen settlement agreement, we write to remind you that this dispute has been pending for over a month now, which includes a three week period where Celgene refused to respond to Defendants' initial inquiry on this topic. We also remind you of Celgene's statutory obligation to reasonably cooperate in expediting this action. See 21 U.S.C. § 355(j)(5)(B)(iii). If we do not hear from you by close of business next Wednesday, June 19, 2019, on whether Celgene will be producing the Celgene-Synthon/Alvogen settlement agreement, at least Apotex will be approaching the Court thereafter for relief.

- Roshan

---

**From:** Shrestha, Roshan P. <rshrestha@taftlaw.com>  
**Sent:** Wednesday, June 12, 2019 6:32 PM  
**To:** Frank Calvosa <frankcalvosa@quinnemanuel.com>  
**Cc:** clizza@saul.com <clizza@saul.com>; wbaton@saul.com <wbaton@saul.com>; Sullivan, Sarah A. <Sarah.Sullivan@saul.com>; Moses, David L. <David.Moses@saul.com>; Callo, Alexander <alexander.callo@saul.com>; Nick Cerrito <nickcerrito@quinnemanuel.com>; Eric Stops <ericstops@quinnemanuel.com>; Evangeline Shih <evangelineshih@quinnemanuel.com>; Andrew Chalson <andrewchalson@quinnemanuel.com>; Gabriel Brier <gabrielbrier@quinnemanuel.com>; Marta Godecki <martagodecki@quinnemanuel.com>; jpelsevier@jonesday.com <jpelsevier@jonesday.com>; cmiller@jonesday.com <cmiller@jonesday.com>; sjcorr@jonesday.com <sjcorr@jonesday.com>; Pomalyst <pomalyst@quinnemanuel.com>; Celgene\_JD\_Lit@jonesday.com <'Celgene\_JD\_Lit@jonesday.com'>; TevaPomalystKEService@kirkland.com <'TevaPomalystKEService@kirkland.com'>; McLennan, Mark C. <mark.mclennan@kirkland.com>; Liza M. Walsh <lwalsh@thewalshfirm.com>; cgannon@thewalshfirm.com <cgannon@thewalshfirm.com>; Eleonore Ofosu-Antwi <eofosuantwi@walsh.law>; Reichenbach, Kristen P.L. <kristen.reichenbach@kirkland.com>; Alul, Andrew M. <AAlul@taftlaw.com>; Murray, Brian P. <bmurray@taftlaw.com>; Kong, T.O. <TKong@wsrg.com>; Steiner, Ellie <esteiner@wsrg.com>; Altman, Jacqueline <jacqueline.altman@wsrg.com>; Hanson, Tina <thanson@wsrg.com>; Siedlak, Sarah <ssiedlak@wsrg.com>; ACalmann@saiber.com <'ACalmann@saiber.com'>; JHalpern@saiber.com <'JHalpern@saiber.com'>; MHu@saiber.com <'MHu@saiber.com'>; Corbin, Bethany <BCorbin@wileyrein.com>; Seth, Neal <NSeth@wileyrein.com>;

wwweeks@wileyrein.com; csaveriano@hillwallack.com; Wiley Hetero Poma <Wiley\_Hetero\_Poma@wileyrein.com>

**Subject:** Re: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Frank:

We are available [on Friday, June 14th at 2:00 pm ET](#). Please use the following dial-in.

Dial-in: [1-800-330-5498](#)

[Passcode: 312 836 4135](#)

- Roshan

On Jun 11, 2019, at 9:37 AM, Frank Calvosa <[frankcalvosa@quinnemanuel.com](mailto:frankcalvosa@quinnemanuel.com)> wrote:

Roshan,

We can be available tomorrow at 10 am or Friday at 2 pm. Please let us know which time works best and circulate a dial-in.

Thanks,

**Frank Calvosa**

*Associate*

**Quinn Emanuel Urquhart & Sullivan, LLP**

51 Madison Avenue, 22nd Floor  
New York, NY 10010  
212-849-7569 Direct  
212-849-7000 Main Office Number  
212-849-7100 FAX  
[frankcalvosa@quinnemanuel.com](mailto:frankcalvosa@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

**From:** Shrestha, Roshan P. [<mailto:rshrestha@taftlaw.com>]

**Sent:** Friday, June 07, 2019 3:57 PM

**To:** Frank Calvosa <[frankcalvosa@quinnemanuel.com](mailto:frankcalvosa@quinnemanuel.com)>; [clizza@saul.com](mailto:clizza@saul.com); [wbaton@saul.com](mailto:wbaton@saul.com); 'Sullivan, Sarah A.' <[Sarah.Sullivan@saul.com](mailto:Sarah.Sullivan@saul.com)>; 'Moses, David L.' <[David.Moses@saul.com](mailto:David.Moses@saul.com)>; 'Callo, Alexander' <[alexander.callo@saul.com](mailto:alexander.callo@saul.com)>; Nick Cerrito <[nickcerrito@quinnemanuel.com](mailto:nickcerrito@quinnemanuel.com)>; Eric Stops <[ericstops@quinnemanuel.com](mailto:ericstops@quinnemanuel.com)>; Evangeline Shih <[evangelineshih@quinnemanuel.com](mailto:evangelineshih@quinnemanuel.com)>; Andrew Chalson <[andrewchalson@quinnemanuel.com](mailto:andrewchalson@quinnemanuel.com)>; Gabriel Brier <[gabrielbrier@quinnemanuel.com](mailto:gabrielbrier@quinnemanuel.com)>; Marta Godecki <[martagodecki@quinnemanuel.com](mailto:martagodecki@quinnemanuel.com)>; [jpelsevier@jonesday.com](mailto:jpelsevier@jonesday.com); [cmiller@jonesday.com](mailto:cmiller@jonesday.com); [sjcorr@jonesday.com](mailto:sjcorr@jonesday.com); Pomalyst <[pomalyst@quinnemanuel.com](mailto:pomalyst@quinnemanuel.com)>; 'Celgene JD Lit@jonesday.com'

**Cc:** [TevaPomalystKEService@kirkland.com](mailto:TevaPomalystKEService@kirkland.com); 'McLennan, Mark C.' <[mark.mclennan@kirkland.com](mailto:mark.mclennan@kirkland.com)>; 'Liza M. Walsh' <[lwalsh@thewalshfirm.com](mailto:lwalsh@thewalshfirm.com)>; [cgannon@thewalshfirm.com](mailto:cgannon@thewalshfirm.com); 'Eleonore Ofosu-Antwi'

<eofosuanti@walsh.law>; 'Reichenbach, Kristen P.L.' <kristen.reichenbach@kirkland.com>; Alul, Andrew M. <AAlul@taftlaw.com>; Murray, Brian P. <bmmurray@taftlaw.com>; 'Kong, T.O.' <TKong@wsrg.com>; 'Steiner, Ellie' <esteiner@wsrg.com>; 'Altman, Jacqueline' <jacqueline.altman@wsrg.com>; 'Hanson, Tina' <thanson@wsrg.com>; 'Siedlak, Sarah' <ssiedlak@wsrg.com>; 'ACalmann@saiber.com'; 'JHalpern@saiber.com'; 'MHu@saiber.com'; Corbin, Bethany <BCorbin@wileyrein.com>; Seth, Neal <NSeth@wileyrein.com>; wweeks@wileyrein.com; csaveriano@hillwallack.com; Wiley Hetero Poma <Wiley\_Hetero\_Poma@wileyrein.com>  
**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

[EXTERNAL EMAIL]

Frank,

We have a conflict at Tuesday 10 AM EDT. Apotex, Teva, Mylan, and Hetero are available Monday before Noon EDT, next Wednesday before 3 PM EDT, and next Friday after Noon EDT.

Please let us know what works for you on these dates and times.

- Roshan

---

**From:** Frank Calvosa <frankcalvosa@quinnemanuel.com>

**Sent:** Thursday, June 6, 2019 3:23 PM

**To:** Shrestha, Roshan P. <rshrestha@taftlaw.com>; 'clizza@saul.com'; 'wbato@saul.com'; 'Sullivan, Sarah A.' <Sarah.Sullivan@saul.com>; 'Moses, David L.' <David.Moses@saul.com>; 'Callo, Alexander' <alexander.callo@saul.com>; Nick Cerrito <nickcerrito@quinnemanuel.com>; Eric Stops <ericstops@quinnemanuel.com>; Evangeline Shih <evangelineshih@quinnemanuel.com>; Andrew Chalson <andrewchalson@quinnemanuel.com>; Gabriel Brier <gabrielbrier@quinnemanuel.com>; Marta Godecki <martagodecki@quinnemanuel.com>; 'jpelsevier@jonesday.com'; 'cmiller@jonesday.com'; 'sjcorr@jonesday.com'; Pomalyst <pomalyst@quinnemanuel.com>; 'Celgene JD Lit@jonesday.com'

**Cc:** 'TevaPomalystKEService@kirkland.com'; 'McLennan, Mark C.' <mark.mclennan@kirkland.com>; 'Liza M. Walsh' <lwalsh@thewalshfirm.com>; 'cgannon@thewalshfirm.com'; 'Eleonore Ofosu-Antwi' <eofosuanti@walsh.law>; 'Reichenbach, Kristen P.L.' <kristen.reichenbach@kirkland.com>; Alul, Andrew M. <AAlul@taftlaw.com>; Murray, Brian P. <bmmurray@taftlaw.com>; 'Kong, T.O.' <TKong@wsrg.com>; 'Steiner, Ellie' <esteiner@wsrg.com>; 'Altman, Jacqueline' <jacqueline.altman@wsrg.com>; 'Hanson, Tina' <thanson@wsrg.com>; 'Siedlak, Sarah' <ssiedlak@wsrg.com>; 'ACalmann@saiber.com'; 'JHalpern@saiber.com'; 'MHu@saiber.com'; Corbin, Bethany <BCorbin@wileyrein.com>; Seth, Neal <NSeth@wileyrein.com>; wweeks@wileyrein.com; csaveriano@hillwallack.com; Wiley Hetero Poma <Wiley\_Hetero\_Poma@wileyrein.com>

**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Roshan,

Celgene does not agree with Defendants' position. We can be available to meet and confer on Tuesday at 10 am Eastern.

Best,

**Frank Calvosa**  
Associate

**Quinn Emanuel Urquhart & Sullivan, LLP**

51 Madison Avenue, 22nd Floor  
New York, NY 10010  
212-849-7569 Direct  
212-849-7000 Main Office Number  
212-849-7100 FAX  
[frankcalvosa@quinnemanuel.com](mailto:frankcalvosa@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

**From:** Shrestha, Roshan P. [<mailto:rshrestha@taftlaw.com>]

**Sent:** Friday, May 31, 2019 4:18 PM

**To:** 'clizza@saul.com'; 'wbaton@saul.com'; 'Sullivan, Sarah A.' <[Sarah.Sullivan@saul.com](mailto:Sarah.Sullivan@saul.com)>; 'Moses, David L.' <[David.Moses@saul.com](mailto:David.Moses@saul.com)>; 'Callo, Alexander' <[alexander.callo@saul.com](mailto:alexander.callo@saul.com)>; Nick Cerrito <[nickcerrito@quinnemanuel.com](mailto:nickcerrito@quinnemanuel.com)>; Eric Stops <[ericstops@quinnemanuel.com](mailto:ericstops@quinnemanuel.com)>; Evangeline Shih <[evangelineshih@quinnemanuel.com](mailto:evangelineshih@quinnemanuel.com)>; Andrew Chalson <[andrewchalson@quinnemanuel.com](mailto:andrewchalson@quinnemanuel.com)>; Gabriel Brier <[gabrielbrier@quinnemanuel.com](mailto:gabrielbrier@quinnemanuel.com)>; Marta Godecki <[martagodecki@quinnemanuel.com](mailto:martagodecki@quinnemanuel.com)>; 'jpelsevier@jonesday.com'; 'cmiller@jonesday.com'; 'sicorr@jonesday.com'; Pomalyst <[pomalyst@quinnemanuel.com](mailto:pomalyst@quinnemanuel.com)>; 'Celgene JD Lit@jonesday.com'  
**Cc:** 'TevaPomalystKEService@kirkland.com'; 'McLennan, Mark C.' <[mark.mclennan@kirkland.com](mailto:mark.mclennan@kirkland.com)>; 'Liza M. Walsh' <[lwalsh@thewalshfirm.com](mailto:lwalsh@thewalshfirm.com)>; 'cgannon@thewalshfirm.com'; 'Eleonore Ofosu-Antwi' <[eofosuantwi@walsh.law](mailto:eofosuantwi@walsh.law)>; 'Reichenbach, Kristen P.L.' <[kristen.reichenbach@kirkland.com](mailto:kristen.reichenbach@kirkland.com)>; Alul, Andrew M. <[AAIul@taftlaw.com](mailto:AAIul@taftlaw.com)>; Murray, Brian P. <[bmurray@taftlaw.com](mailto:bmurray@taftlaw.com)>; 'Kong, T.O.' <[TKong@wsrg.com](mailto:TKong@wsrg.com)>; 'Steiner, Ellie' <[esteiner@wsrg.com](mailto:esteiner@wsrg.com)>; 'Altman, Jacqueline' <[jacqueline.altman@wsrg.com](mailto:jacqueline.altman@wsrg.com)>; 'Hanson, Tina' <[thanson@wsrg.com](mailto:thanson@wsrg.com)>; 'Siedlak, Sarah' <[ssiedlak@wsrg.com](mailto:ssiedlak@wsrg.com)>; 'ACalmann@saiber.com'; 'JHalpern@saiber.com'; 'MHu@saiber.com'; Corbin, Bethany <[BCorbin@wileyrein.com](mailto:BCorbin@wileyrein.com)>; Seth, Neal <[NSeth@wileyrein.com](mailto:NSeth@wileyrein.com)>; [wweeks@wileyrein.com](mailto:wweeks@wileyrein.com); [csaveriano@hillwallack.com](mailto:csaveriano@hillwallack.com); Wiley Hetero Poma <[Wiley\\_Hetero\\_Poma@wileyrein.com](mailto:Wiley_Hetero_Poma@wileyrein.com)>  
**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

[EXTERNAL EMAIL]

Frank:

From a phone conversation we just had with you, we understand that the in-house Celgene attorney responsible for this matter is unavailable until next week, and that you will strive to get us a response by the end of next week.

We look forward to hearing your response by the end of next week.

- Roshan

**Taft /**

**Roshan P. Shrestha, Ph.D. / Attorney**  
Taft Stettinius & Hollister LLP  
111 E. Wacker Drive, Suite 2800  
Chicago, Illinois 60601-3713  
Tel: 312.527.4000 • Fax: 312.966.8573  
Direct: 312.840.4339  
[www.taftlaw.com](http://www.taftlaw.com) / [rshrestha@taftlaw.com](mailto:rshrestha@taftlaw.com)



Subscribe to our law updates

This message may contain information that is attorney-client privileged, attorney work product or otherwise confidential. If you are not an intended recipient, use and disclosure of this message are prohibited. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

---

**From:** Shrestha, Roshan P.

**Sent:** Friday, May 31, 2019 2:31 PM

**To:** 'clizza@saull.com'; 'wbarton@saull.com'; 'Sullivan, Sarah A.' <Sarah.Sullivan@saull.com>; 'Moses, David L.' <David.Moses@saull.com>; 'Callo, Alexander' <alexander.callo@saull.com>; 'Nick Cerrito' <nickcerrito@quinnemanuel.com>; 'Eric Stops' <ericstops@quinnemanuel.com>; 'Evangeline Shih' <evangelineshih@quinnemanuel.com>; 'Andrew Chalson' <andrewchalson@quinnemanuel.com>; 'Gabriel Brier' <gabrielbrier@quinnemanuel.com>; 'Marta Godecki' <martagodecki@quinnemanuel.com>; 'jpelsevier@jonesday.com'; 'cmiller@jonesday.com'; 'sjcorr@jonesday.com'; 'Pomalyst' <pomalyst@quinnemanuel.com>; 'Celgene JD Lit@jonesday.com'

**Cc:** 'TevaPomalystKEService@kirkland.com'; 'McLennan, Mark C.' <mark.mclennan@kirkland.com>; 'Liza M. Walsh' <lwalsh@thewalshfirm.com>; 'cgannon@thewalshfirm.com'; 'Eleonore Ofosu-Antwi' <eofosuanti@walsh.law>; 'Reichenbach, Kristen P.L.' <kristen.reichenbach@kirkland.com>; 'Alul, Andrew M.' <AAlul@taftlaw.com>; 'Murray, Brian P.' <bmurray@taftlaw.com>; 'Kong, T.O.' <TKong@wsrg.com>; 'Steiner, Ellie' <esteiner@wsrg.com>; 'Altman, Jacqueline' <jacqueline.altman@wsrg.com>; 'Hanson, Tina' <thanson@wsrg.com>; 'Siedlak, Sarah' <ssiedlak@wsrg.com>; 'ACalmann@saiber.com'; 'JHalpern@saiber.com'; 'MHu@saiber.com'

**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Frank:

It has been three weeks since Defendants requested that Celgene immediately produce the Celgene-Synthon/Alvogen settlement documents, and we have yet to get a response from you on this. If we do not hear from you by close of business next Monday, June 3, at least Apotex, Mylan, and Teva will be approaching the Court for assistance.

Thanks.

- Roshan

---

**From:** Shrestha, Roshan P.

**Sent:** Wednesday, May 22, 2019 1:16 PM

**To:** 'clizza@saull.com' <clizza@saull.com>; 'wbarton@saull.com' <wbarton@saull.com>; 'Sullivan, Sarah A.' <Sarah.Sullivan@saull.com>; 'Moses, David L.' <David.Moses@saull.com>; 'Callo, Alexander' <alexander.callo@saull.com>; 'Nick Cerrito' <nickcerrito@quinnemanuel.com>; 'Eric Stops' <ericstops@quinnemanuel.com>; 'Evangeline Shih' <evangelineshih@quinnemanuel.com>; 'Andrew Chalson' <andrewchalson@quinnemanuel.com>; 'Gabriel Brier' <gabrielbrier@quinnemanuel.com>; 'Marta Godecki' <martagodecki@quinnemanuel.com>; 'jpelsevier@jonesday.com' <jpelsevier@jonesday.com>; 'cmiller@jonesday.com' <cmiller@jonesday.com>; 'sjcorr@jonesday.com' <sjcorr@jonesday.com>; 'Pomalyst' <pomalyst@quinnemanuel.com>; 'Celgene JD Lit@jonesday.com' <Celgene JD Lit@jonesday.com>

**Cc:** 'TevaPomalystKEService@kirkland.com' <TevaPomalystKEService@kirkland.com>; 'McLennan, Mark C.' <mark.mclennan@kirkland.com>; 'Liza M. Walsh' <lwalsh@thewalshfirm.com>; 'cgannon@thewalshfirm.com' <cgannon@thewalshfirm.com>; 'Eleonore Ofosu-Antwi' <eofosuanti@walsh.law>; 'Reichenbach, Kristen P.L.' <kristen.reichenbach@kirkland.com>; 'gurpreet.walia@fisherbroyles.com' <gurpreet.walia@fisherbroyles.com>; 'joseph.schramm@fisherbroyles.com' <joseph.schramm@fisherbroyles.com>; 'Gregory.Miller@rivkin.com' <Gregory.Miller@rivkin.com>; 'jenna.gabay@rivkin.com' <jenna.gabay@rivkin.com>; Alul, Andrew M. <AAlul@taftlaw.com>; Murray, Brian P. <bmurray@taftlaw.com>; 'Kong, T.O.' <TKong@wsrg.com>; 'Steiner, Ellie' <esteiner@wsrg.com>; 'Gary.Ji@fisherbroyles.com' <Gary.Ji@fisherbroyles.com>; 'Altman, Jacqueline' <jacqueline.altman@wsrg.com>; 'Hanson, Tina' <thanson@wsrg.com>; 'Siedlak, Sarah' <ssiedlak@wsrg.com>; 'ACalmann@saiber.com' <ACalmann@saiber.com>; 'JHalpern@saiber.com' <JHalpern@saiber.com>; 'MHu@saiber.com' <MHu@saiber.com>; 'eabraham@hillwallack.com' <eabraham@hillwallack.com>; 'csaveriano@hillwallack.com' <csaveriano@hillwallack.com>; 'Wiley Hetero Poma' <Wiley\_Hetero\_Poma@wileyrein.com>; 'Seth, Neal' <NSeth@wileyrein.com>  
**Subject:** RE: Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Counsel:

Please provide us a response to our email below as soon as possible and no later than this Friday, May 24.

Thanks.

- Roshan

---

**From:** Shrestha, Roshan P.

**Sent:** Friday, May 10, 2019 3:47 PM

**To:** 'clizza@saul.com' <clizza@saul.com>; 'wbaton@saul.com' <wbaton@saul.com>; 'Sullivan, Sarah A.' <Sarah.Sullivan@saul.com>; 'Moses, David L.' <David.Moses@saul.com>; 'Callo, Alexander' <alexander.callo@saul.com>; 'Nick Cerrito' <nickcerrito@quinnemanuel.com>; 'Eric Stops' <ericstops@quinnemanuel.com>; 'Evangeline Shih' <evangelineshih@quinnemanuel.com>; 'Andrew Chalson' <andrewchalson@quinnemanuel.com>; 'Gabriel Brier' <gabrielbrier@quinnemanuel.com>; 'Marta Godecki' <martagodecki@quinnemanuel.com>; 'jpelsevier@jonesday.com' <jpelsevier@jonesday.com>; 'cmiller@jonesday.com' <cmiller@jonesday.com>; 'sjcorr@jonesday.com' <sjcorr@jonesday.com>; 'Pomalyst' <pomalyst@quinnemanuel.com>; 'Celgene JD\_Lit@jonesday.com' <Celgene\_JD\_Lit@jonesday.com>

**Cc:** 'TevaPomalystKEService@kirkland.com' <TevaPomalystKEService@kirkland.com>; 'McLennan, Mark C.' <mark.mclennan@kirkland.com>; 'Liza M. Walsh' <lwalsh@thewalshfirm.com>; 'cgannon@thewalshfirm.com' <cgannon@thewalshfirm.com>; 'Eleonore Ofosu-Antwi' <eofosuanti@walsh.law>; 'Reichenbach, Kristen P.L.' <kristen.reichenbach@kirkland.com>; 'gurpreet.walia@fisherbroyles.com' <gurpreet.walia@fisherbroyles.com>; 'joseph.schramm@fisherbroyles.com' <joseph.schramm@fisherbroyles.com>; 'Gregory.Miller@rivkin.com' <Gregory.Miller@rivkin.com>; 'jenna.gabay@rivkin.com' <jenna.gabay@rivkin.com>; Alul, Andrew M. <AAlul@taftlaw.com>; Murray, Brian P. <bmurray@taftlaw.com>; 'Kong, T.O.' <TKong@wsrg.com>; 'Steiner, Ellie' <esteiner@wsrg.com>; 'Gary.Ji@fisherbroyles.com' <Gary.Ji@fisherbroyles.com>; 'Altman, Jacqueline' <jacqueline.altman@wsrg.com>; 'Hanson, Tina' <thanson@wsrg.com>; 'Siedlak, Sarah' <ssiedlak@wsrg.com>; 'ACalmann@saiber.com' <ACalmann@saiber.com>; 'JHalpern@saiber.com' <JHalpern@saiber.com>; 'MHu@saiber.com' <MHu@saiber.com>; 'eabraham@hillwallack.com' <eabraham@hillwallack.com>; 'csaveriano@hillwallack.com' <csaveriano@hillwallack.com>; 'Wiley



Hetero Poma' <[Wiley\\_Hetero\\_Poma@wileyrein.com](mailto:Wiley_Hetero_Poma@wileyrein.com)>; 'Seth, Neal' <[NSeth@wileyrein.com](mailto:NSeth@wileyrein.com)>

**Subject:** Celgene v. Hetero et al. (pomalidomide): Production of Synthon/Alvogen SA documents

Counsel:

We write on behalf of Defendants Apotex, Aurobindo, the Mylan Defendants, Teva, and Hetero (collectively, "Defendants"). Defendants request that Celgene immediately produce any settlement and/or licensing agreement Celgene has entered into in connection with *Celgene Corporation v. Synthon Pharmaceuticals Inc.*, C.A. Nos. 18-10775 and 19-9737 (ES)(MAH) (D.N.J.), including any agreement underlying the consent judgment referenced in, and attached to, the attached letter, as well as any non-privileged documents concerning such agreement. Defendants maintain that such documents are responsive to at least Defendants' Request for Production No. 59, and are relevant to the invalidity/unenforceability of the patents-in-suit, and to the permanent injunctive relief Celgene seeks against Defendants in this case. *See, e.g., Pfizer Inc. v. Apotex Inc.*, 731 F. Supp. 2d 754, 758-762 (N.D. Ill. 2010).

If Celgene refuses to comply with this request, please provide us with your availability to meet and confer regarding this issue as soon as possible.

- Roshan